VERNER, LIIPFERT, BERNHARD, MCPHERSON AND HAND

901-15TH STREET, N.W. WASHINGTON, D.C. 20005-2301

8280 GREENSBORO DRIVE SUITE 601 MCLEAN, VIRGINIA 22102 (703) 749-6000 TELECOPIER: (703) 749-6027

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Thomas J. Keller (202) 371-6060

November 16, 1994

HAND-DELIVERED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission OCKET FILE COPY OR CINAL
1919 M Street, N.W.- Room 222
Washington, D.C. 20554

Re: Permissible Ex Parte Presentations in PR Docket No. 92-235

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's Rules, this is to inform the Commission that the Association of American Railroads; Forest Industries Telecommunications; International Taxicab and Livery Association; Manufacturers Radio Frequency Advisory Committee, Inc.; Utilities Telecommunications Council; American Automobile Association; International Telecommunications Association; American Petroleum Institute; National Association of Business and Educational Radio; and the Association of Public-Safety Communications Officials-International, Inc., met with members of the Commission's Private Radio Bureau Staff on November 15, 1994, to discuss the above-referenced proceeding.

During the course of the meeting, discussion was held concerning the enclosed documents which were prepared by the FCC staff and distributed to all attendees at the meeting.

Respectfully submitted,

Thomas J. Keller

cc: Representatives of the above-named organizations Kathryn Hosford (PRB)

Herb Zeiler (PRB) Ron Netro (PRB) Ira Keltz (PRB) Joe Levin (PRB)

No. of Copies rec'd_ List A B C D E

IMPLEMENTATION PLAN BASED ON 10/13/94 PLAN

26 years

Date 1 [1997]: equipment sold must be <12.5 or compatible

new systems must operate at 12.5 or equivalant

Date 2 [2007]: urban systems must operate at 12.5 or equivalent

Date 3 [2011]: equipment TA must be <6.25 or compatible

new systems must operate at 6.25 or equivalent

Date 4 [2021]: all systems must operate at 6.25 or equivalent

New system -- a new repeater site that extends coverage of an existing system would NOT be considered a new system.

- **VHF channelized at 7.5 kHz, except PS at 6.25 kHz**
- **UHF channelized at 6.25 kHz**

New channels -- available immediately for 12.5 or equivalent

PHASE I: 20-->12.5 or 6.25 kHz

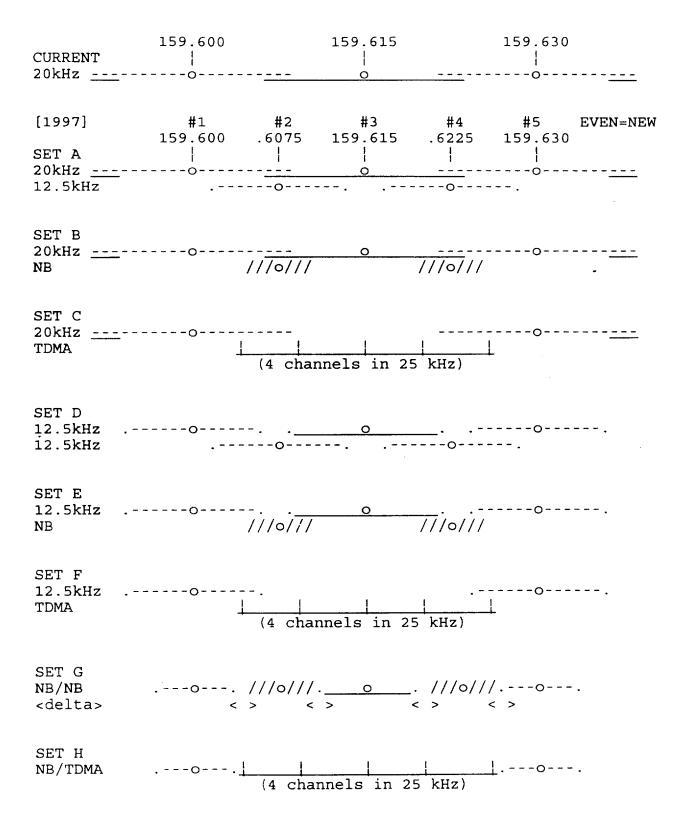
- o all new stations must be 12.5 or equivalent
- o urban systems until date 2 [1995-2007, 12 years]
- o rural systems until date 4 [1995-2021, 26 years]

PHASE II: 12.5-->6.25 kHz

- o all new stations must be 6.25 or equivalent
- o urban systems from date 2-4 [2007-2021, 14 years]
- o rural systems until date 4 [1995-2021, 26 years]

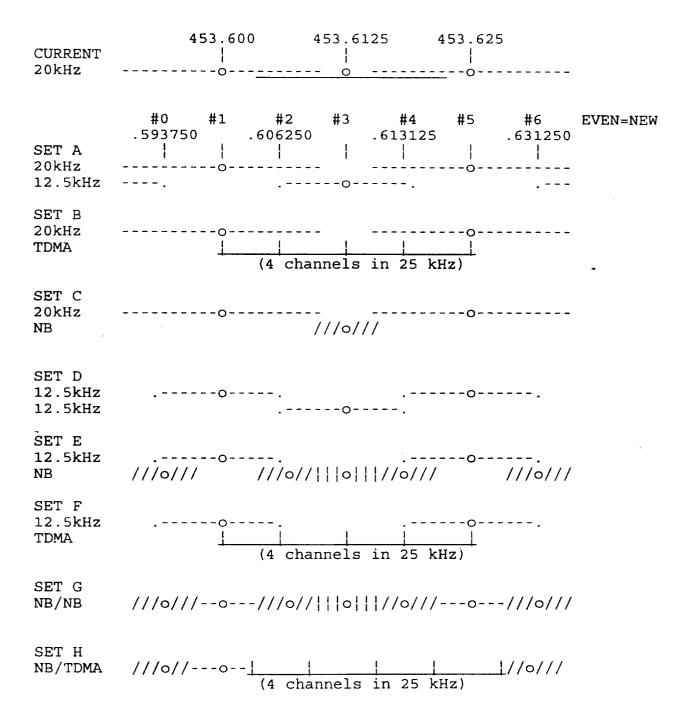
^{**}One Step 20->6.25 kHz or Two Steps 20->12.5->6.25 kHz**

EXAMPLE: VHF (150-170 kHz) AT 7.5 kHz CHANNELIZATION



NOTE: After Date 2 [2007], 20 kHz not applicable for urban areas.

EXAMPLE: UHF (450-470) AT 6.25 kHz CHANNELIZATION



NOTE: After Date 2 [2007], 20 kHz not applicable for urban areas.

UHF (470-512) AT 6.25 kHz CHANNELIZATION

488.6125		488.63	75		
			, ,		
.606250 .6					
12.5kHz6.25kHz ///o///o//				,	

VHF - PUBLIC SAFETY AT 6.25 kHz CHANNELIZATION .					
9 channels @ 15 kHz (135 kHz spectum)> 20 channels					
1 2 3 4	1 5	6	7	8	9
0)	0	-0	0	-0
000	oo	0	-0	0	-0
onnononononononononono					
1 freq shift ι	upward (or cl	osest)		2	20
onnono	ono-	-non-		on	-c

Questions and Topics concerning Transition Plan

Adjacent channel separations

Digital and analog in same environment

Backward/Forward operation

Definition of new system (footnote ***)

Relocation of UHF Low Power channels

Failure of narrowband at VHF 90,271

Depletion of 20 kHz equipment by 1997

VHF 7.5 charmel spacing 6,25 Bw?

Interference between 12.5 + 20

REFARMING

PURPOSE:

TO RELIEVE FREQUENCY CONGESTION FOR THE "MAIN-HAUL" PRIVATE LAND MOBILE COMMUNICATIONS BANDS

NPRM GOALS:

- o TO INCREASE CHANNEL CAPACITY IN BANDS BELOW 512 MHz
- o TO PROMOTE MORE EFFICIENT USE OF THESE CHANNELS
- o TO SIMPLIFY OUR POLICIES GOVERNING THE USE OF THESE BANDS
- o TO ALLOW A REASONABLE TRANSITION PERIOD

BANDS USED BY DIVERSE GROUP OF BUSINESS AND GOVERNMENT ENTITIES (police and fire departments, highway authorities, trucking and land transportation, railroads, petroleum and utilities, large industries, and small businesses)

FUNDAMENTALLY, REFARMING SHOULD ADDRESS THE FUTURE REQUIREMENTS OF THE PRIVATE LAND MOBILE COMMUNITY WELL INTO THE 21st CENTURY

Kathryn Hosford, FCC November 15, 1994

REFARMING CONSIDERATIONS

EXISTING TERRAIN:

25 MHz of Nationwide Spectrum (9 VHF, 16 UHF)

6-12 MHz in 11 Urban Areas at UHF

12 Million Transmitters Existing

15 Billion Dollars in Investment

COMPETING REQUIREMENTS:

Large Users - Small Users

Sophisticated Systems - Low End Cheap Radios

Voice - Paging - Facsimile

Narrowband - Broadband (56kbs-1Mbs)

TECHNOLOGY:

Trunking, Low Power Cell-type, Duplex operations

FDMA, TDMA, ACSB, LM

6.25/5 kHz Equipment

APCO-25 Standard

Dual Mode, Forward/Backward Compatible

FEDERAL GOVERNMENT:

Requires 12.5 kHz starting 1995, all systems converted by 2005 Equipment at 12.5 currently available (Motorola/Ericson GE) APCO-25 type equipment from 4-5 vendors (additional 5 soon)

WHERE DO YOU WANT TO BE IN 15 [26] YEARS?

- o PRIVATE LAND MOBILE RADIO: focus on private
- o FLEXIBILITY narrowband channel plan
- o INCREASED SYSTEM PLANNING frequency coordinators